

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 08 C 1161
)	
SCHECK INDUSTRIAL CORPORATION,)	JUDGE WILLIAM T. HART
a Minnesota corporation,)	
)	
Defendant.)	

AFFIDAVIT

STATE OF ILLINOIS)
) SS.
COUNTY OF KANE)

DEBORAH L. FRENCH, being first duly sworn upon her oath, deposes and states:

1. I am the Collections Department Manager for the Carpenters Fringe Benefit Funds of Illinois and in such capacity, I have knowledge of the matters hereinafter set forth and if called as a witness in the instant proceedings I am competent to testify in respect thereto.

2. I have read the Complaint filed in this cause, and know of my own personal knowledge the contents of the collective bargaining agreements and Agreements and Declarations of Trust, and all facts alleged therein, and if called and sworn as a witness I am competent to testify thereto.

3. I am charged with keeping and maintaining records of contributions received by the Plaintiff Funds, I maintain individual records on each person, firm and corporation required

Carpenters v. Scheck Industry and Scheck Mechanical
Civil Action No. 08 C 1161

to make contributions to said Plaintiff Funds, I receive and record contribution reports made by such persons, firms or corporations, and I have under my supervision and direction all books, records, documents and papers relating to such Plaintiff Funds.

4. An audit was performed upon the payroll books and records of Defendant, Scheck Industrial Corporation, by Romolo & Associates, Certified Public Accountants. The audit covered the period from April 1, 2005 through September 30, 2007. Attached is a copy of the audit report.

5. I have examined the Statement of Additional Reportable Hours that was prepared by Romolo & Associates and have determined that, based upon those additional hours for which contributions are due and all other evidence maintained in my records, the amount of \$38,201.63 is due from the Defendant to the Plaintiff Funds for contributions.

6. Pursuant to the Trust Agreements, a liquidated damages surcharge has been assessed against the Defendant based on the unpaid contributions due pursuant to the audit in the total amount of \$3,291.47.

7. I am duly authorized by Plaintiffs in this behalf, I have personal knowledge of the matters set forth above and if I am called as a witness in this cause, I am competent to testify thereto.

8. I make this Affidavit in support of the application of Plaintiffs for entry of default and judgment and request this Court to consider the same as proof in support of the allegations contained in the Complaint of the Plaintiffs and such other facts herein set forth.

Carpenters v, Scheck Industry and Scheck Mechanical
Civil Action No. 08 C 1161

FURTHER AFFIANT SAYETH NOT.

Deborah L. French
DEBORAH L. FRENCH

SUBSCRIBED AND SWORN to
before me this 10th
day of September 2008.

Deborah A. Farrell
NOTARY PUBLIC



\\Carpa\Scheck Industry\French affidavit default judgment.pnr.df.wpd

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Affidavit of Deborah L. French) with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Thomas A. Christensen
Huck, Bouma, P.C.
1755 S. Naperville Road, Suite 200
Wheaton, IL 60187
tchristensen@huckbouma.com

I hereby certify that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 10th day of September 2008:

Jeffery M. Heftman
Vedder Price, P.C.
222 N. LaSalle Street, Suite 2400
Chicago, IL 60601

I further hereby certify that I have sent the above-referenced document by facsimile to the following non-CM/ECF participant on or before the hour of 4:00 p.m. this 10th day of September 2008:

Jeffery M. Heftman
Vedder Price, P.C.
222 N. LaSalle Street, Suite 2400
Chicago, IL 60601
(312)609-5005

/s/ Patrick N. Ryan

Patrick N. Ryan
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